

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF TEXAS HOUSTON DIVISION**

NATIONAL DIVERSITY COUNCIL,

Plaintiff,

vs.

R. DENNIS KENNEDY, JASON DEGROOT,
ANGELES VALENCIANO, JASON LEE,
DIVERSITY & LEADERSHIP, INC.,
CALIFORNIA DIVERSITY COUNCIL,

Defendants.

CASE NO. 4:23-CV-01162

JURY TRIAL DEMANDED

DEFENDANTS' JOINT STATUS REPORT

1. On February 10, 2025, the Court requested status from the parties. Following from that request, counsel for Defendants Angeles Valenciano and Jason DeGroot represented that she would confer with all of the counsel and they together would present a joint status report.

2. On February 11, 2025, counsel for all Defendants jointly proposed a conference at 4:00 p.m. via zoom, and an invitation was circulated. Counsel for Plaintiff declined to participate in that conference, stating that Plaintiff will file their own report with the court.

3. In hopes that counsel for Plaintiff would appear, counsel for all Defendants nevertheless appeared at the appointed time for the zoom call and held the "line" open until 4:30 p.m. Plaintiff's counsel failed to appear or participate.

4. As such, the Defendants do not have a joint status to share with Court, other than to state their understanding that the NDC has publicly represented that it is in the process of

winding down and is actively looking for buyers to acquire or purchase the assets of the NDC. The NDC's operations and assets, of course, are at issue in this litigation.

5. As such, counsel for all Defendants request that this Court set a formal status conference.

Respectfully submitted,

CONKLIN STERNFELS PETTY, PLLC

By: /s/ Melissa Nicholson Sternfels
Melissa Nicholson Sternfels
Texas Bar No. 24037181
901 Heights Boulevard
Houston, Texas 77008
Melissa@thecspfirm.com
Direct Dial: 713.997.2416
Fax: 713.660.1801

**ATTORNEY FOR DEFENDANTS JASON
DEGROOT AND ANGELES VALENCIANO**

GREENBERG TRAURIG, LLP

By: /s/ Dwayne Mason
Dwayne L. Mason
State Bar No. 00787977
Email: masonDl@gtlaw.com
Ira R. Hatton
State Bar No. 24054282
Email: hattoni@gtlaw.com
1000 Louisiana Street, Suite 6700
Houston, Texas 77002
Tel. 713-374-3500 Fax 713-374-6605

**COUNSEL FOR DEFENDANTS R. DENNIS
KENNEDY, JASON LEE, DIVERSITY &
LEADERSHIP, INC., AND CALIFORNIA
DIVERSITY COUNCIL**

CERTIFICATE OF SERVICE

THIS WILL CERTIFY that a true and correct copy of the foregoing instrument has been served to all parties/attorneys of record in this cause of action via ECF e- filing requirements on February 12, 2025.

/s/ Melissa Nicholson Sternfels

Melissa Nicholson Sternfels